

**Before the
Federal Communications Commission
Washington, D.C. 20554**

In the Matter of)	
)	
Price Cap Performance Review for)	CC Docket No. 94-1
Local Exchange Carriers)	
)	
Access Charge Reform)	CC Docket No. 96-262

COMMENTS OF SBC

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EXECUTIVE SUMMARY

SBC supports USTA's comments on how the Commission should prescribe the X-factor.

As USTA explains, the option most consistent with the D.C. Circuit's remand and sound economic principles is to apply the 1997 TFP model in a fair, straightforward, and credible manner to recalculate the X-factor for the period covered by the Court's remand. On a going-forward basis, the Commission should adopt either the USTA TFPRP model or the 1997 TFP model, appropriately updated. As USTA persuasively demonstrates, none of the other options proposed by the Commission are economically sound.

Indeed, some of the Commission's alternative proposals threaten to thwart the basic goals of price-cap regulation. The proposed Imputed X study, which relies heavily on cost measurements and ties X-factor changes directly to revenues, represents a complete abandonment of price-cap regulation. More generally, the Commission's constant, and often retrospective, changes to the X-factor threaten to undermine LECs' confidence that they will be allowed to benefit from profits generated by outperforming productivity goals — confidence that is essential to incentive regulation.

Moreover, several of the Commission's proposals appear to consist only of arbitrary data manipulation designed to set the X-factor as high as possible. As the D.C. Circuit made plain in reversing the Commission's last X-factor selection, this results-oriented decisionmaking cannot withstand scrutiny. In the end, the lower access charges sought by the Commission will not come overnight by forcing access charges down arbitrarily, but only by allowing competitive market forces to drive charges down.

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COMMENTS OF SBC

SBC Communications Inc., Southwestern Bell Telephone Company, Pacific Bell, Nevada Bell, The Southern New England Telephone Company, and Ameritech Corporation (collectively “SBC”) submit these comments in response to the Commission’s request for comment in its Further Notice of Proposed Rulemaking, *Price Cap Performance Review for Local Exchange Carriers, Access Charge Reform*, CC Docket Nos. 94-1 & 96-262 (rel. Nov. 15, 1999) (“FNPRM”). In the FNPRM, the Commission seeks comment on how it should prescribe the X-factor in light of the decision of the United States Court of Appeals for the District of Columbia Circuit, which reversed and remanded the Commission’s 1997 decision to set the X-factor at 6.5 percent. *See generally United States Tel. Ass’n v. FCC*, 188 F.3d 521 (D.C. Cir. 1999). The Commission has asked for comment on setting an X-factor for the period covered by the D.C. Circuit’s remand — July 1, 1997, to June 30, 2000 — and also for the period July 1, 2000, going forward.

As a preliminary matter, the Commission has the opportunity to render this proceeding unnecessary. The proposal of the Coalition for Affordable Local and Long Distance Services (“CALLS”), which is a comprehensive plan for interstate universal service and interstate access charges, is currently before the Commission. *See* FNPRM ¶ 4. Adopting the CALLS proposal would obviate the need for the Commission to set a new X-factor, either for the remand period or

going forward. *See id.* SBC supports the CALLS proposal as filed on August 20, 1999.

Nevertheless, in the event that the CALLS proposal is not adopted, SBC herein responds to the Commission's specific requests for comment. As the United States Telephone Association ("USTA") persuasively demonstrates in its comments, the Commission's task here is simple. To respond to the D.C. Circuit's remand and follow sound economic policy, the Commission should set the X-factor for the Court's remand period based on the 1997 Total Factor Productivity ("TFP") model, and, going forward, should adopt either the USTA TFPRP model or the 1997 TFP model, appropriately updated.

The other options proposed by the Commission, which attempt to squeeze out any profits generated by increased productivity, jeopardize the basic goals of price cap regulation by undermining incentives to increase productivity. Furthermore, some of these proposals appear to be nothing more than arbitrary manipulation of data designed to achieve as high an X-factor as possible. The numerous flaws in these proposals are discussed below.

Moreover, the Commission's efforts to drive access charges as low as possible stem from a basic misconception: The Commission cannot simulate the low prices generated by competition overnight through regulation. To the contrary, as Commissioner Powell has emphasized, "policymakers . . . do not engineer competition, private actors do." Speech of Commissioner Michael K. Powell (May 27, 1998). Continued regulation like that proposed in the FNPRM "imposes a direct opportunity cost on the competitive process." *Id.* If the Commission wishes to bring lower access charges, it should remember that price-cap regulation is merely an "an appropriate transitional mechanism" to competition. First Report and Order, *Price Cap Performance Review*, 10 FCC Rcd at 8961, 8966, ¶ 4 (1995) ("*Price Cap*

Performance First Report”). Only by facilitating competition will access charges be reduced in a meaningful, economically sound manner.

ARGUMENT

I. SBC SUPPORTS THE COMMENTS OF USTA

SBC strongly supports the comments of USTA. SBC agrees that the option most consistent with the D.C. Circuit’s remand and sound economic principles is to apply the 1997 TFP model in a fair, straightforward, and credible manner to recalculate the X-factor for the period of July 1, 1997, to June 30, 2000. On a going-forward basis, the Commission should continue to use a TFP model and should adopt either the USTA TFPRP model or the 1997 TFP model updated to include the most recent data available.

As USTA persuasively demonstrates, none of the other options proposed in the FNPRM are economically sound. The 1999 TFP study alters practically every variable in the 1997 model, without rational explanation, with each alteration arbitrarily increasing the X-factor. Among other things, the 1999 TFP model’s measurement of cost of capital is fundamentally flawed. Moody’s Baa bond rate does not reflect a realistic or appropriate proxy for opportunity costs. Further, opportunity costs are but one component of the rental cost of capital. The 1999 study also improperly changes the measure of local output to dial equipment minutes (“DEMs”). This change is wholly inappropriate because only 33 percent of intrastate revenue is related to usage. Because of these flaws and the host of other problems identified by USTA, the Commission should reject the 1999 TFP model.

The Imputed X study is even more problematic. Most importantly, as described in detail below, this study effectively repudiates the core principles of price-cap regulation and suffers from the same fundamental problems as a rate-of-return methodology. In addition, as USTA

explains, the Imputed X study incorrectly relies on Moody's Baa bond rates to create a competitive capital compensation index, attempts to estimate an interstate-only X-factor (which both the Commission and the Court have rejected), incorrectly uses accounting earnings (which lead to erroneous conclusions), and ignores the costs associated with stimulated minutes.

Moreover, as USTA explains, the Commission should eliminate the consumer productivity dividend ("CPD"). The Commission included a CPD in 1991, because the effects of price-cap regulation on productivity were unclear at that time. It makes no sense to include the CPD now, where the X-factor is measured over a period that includes price-cap regulation. Adding the CPD in such circumstances double counts productivity gains and is without basis in law or logic.

Finally, as USTA explains, there is no merit in the Commission's proposal to include a "q" factor in the traffic-sensitive price-cap index ("PCI") formula if it adopts a capacity-based local switching rate structure and its proposal to increase the "g" factor in the common line formula. The "q" factor proposal rests on an erroneous assumption that minutes have grown faster than trunks. The Commission has provided no empirical data to support this assumption; this adjustment is another example of an attempt arbitrarily to lower the price cap based on unwarranted perceptions that LEC earnings are too high. The "g" factor should have been eliminated previously because the TFP model already incorporates any such effect. In addition, because most price-cap LECs have already eliminated the Carrier Common Line ("CCL") charge, the "g" factor is no longer relevant. There is simply no justification for the "g" factor, and it should be completely eliminated.

II. THE COMMISSION’S PROPOSALS ARE INCONSISTENT WITH THE GOALS OF PRICE-CAP REGULATION

Among the numerous flaws that USTA has identified in the Commission’s latest proposals, several are of particular concern because they threaten to thwart the basic goals of price-cap regulation. First, the proposed Imputed X study, which relies heavily on cost measurements and ties X-factor changes directly to revenues, suffers from the same problems as rate-of-return regulation and provides none of the benefits of price-cap regulation. Second, and more generally, the Commission proposes several fundamental changes to the X-factor, including further retrospective changes. These constant, and often retrospective, changes threaten to undermine LECs’ confidence that they will be allowed to benefit from profits generated by outperforming productivity goals — confidence that is an essential element of the Commission’s scheme of incentive regulation.

A. The Staff’s Imputed X Study Suffers From All the Drawbacks of Rate-of-Return Regulation

In the FNPRM, the Commission seeks comment on using the “staff Imputed X” study for calculating the X-factor. *See* FNPRM ¶¶ 40-42. This study measures productivity growth by analyzing expense and revenue data (rather than physical inputs and outputs). *See id.* ¶ 35. The study seeks to set an X-factor that, for all LECs in the aggregate, will produce revenues equal to costs plus a “competitive level of capital compensation.” *See id.* ¶ 36. The data used for the study are purely interstate in nature. *See id.* ¶ 37.

This model, which analyzes cost and revenue data to seek a target rate of return, is burdened by the same defects as rate-of-return regulation. Accordingly, the Commission should reject this methodology for the same reason it replaced rate-of-return regulation with price-cap regulation.

As the Commission itself has emphasized, rate-of-return regulation suffers from a number of significant problems. First, it provides little incentive for carriers to become more efficient: because rate-of-return regulation sets rates based on the cost of providing service, carriers have little economic incentive to reduce their operating costs. *See Second Report and Order, Policy and Rules Concerning Rates for Dominant Carriers*, 5 FCC Rcd 6786, 6789, ¶ 22 (1990) (“*Second Report and Order*”); *First Report and Order, Price Cap Performance First Report*, 10 FCC Rcd at 8973, ¶ 27 (rel. April 7, 1995). In contrast, price-cap regulation encourages carriers to lower costs by allowing them to keep the additional earnings generated by increasing their productivity at a rate greater than required by the price-cap formula. *See Price Cap Performance First Report*, 10 FCC Rcd at 8973, ¶ 28.

Second, rate-of-return regulation requires collecting detailed data and is extremely costly to administer. Because such regulation ties rates to costs, it requires that costs for the regulated services be calculated in isolation from costs of other services, even when those other services are provided through the same equipment. Moreover, such regulation creates an incentive for carriers to shift costs from unregulated services to services subject to rate-of-return rules, where they may be fully recovered. *See id.* at 8973, ¶ 27. These cost-allocation concerns require “elaborate regulatory oversight of all the carrier’s costs.” *Id.*; *see also Second Report and Order*, 5 FCC Rcd at 6791, ¶ 34.

The Imputed X study suffers from the exact same defects. Most importantly, it creates the same disincentive to improve efficiency. Just as in rate-of-return regulation, the model measures carriers’ costs and revenues and seeks to achieve a specified rate of return. Any gains in efficiency that enable carriers to exceed the target rate of return will result in a higher X-factor. In other words, carriers are ultimately required to return excess earnings. Thus, as in

rate-of-return regulation, tying price changes directly to cost savings blunts incentives to become more efficient.

Indeed, the Commission has already recognized this fact. As it acknowledges, the Imputed X study differs only slightly from the “Direct Model” or “Historical Revenue Approach” once proposed by AT&T. *See* FNPRM ¶ 38. The Commission explicitly rejected the use of that model based in large part on incentive problems:

The Historical Revenue Method would set the X-Factor prospectively at the level that would have, in retrospect, produced an industry-wide average rate of return of 11.25 percent under price cap regulation. Adopting the Historical Revenue Method on a moving-average basis, as GSA recommends, would create substantially similar incentives to those under rate-of-return regulation, because the X-Factor would be explicitly linked to earnings. . . . [W]e expressed concerns that the Historical Revenue Approach might not provide sufficient incentives for productivity growth, to the extent that increases in industry-wide earnings would increase the X-Factor. No one has adequately responded to this concern.

Fourth Report and Order, *Price Cap Performance Review for Local Exchange Carriers, Access Charge Reform*, 12 FCC Rcd 16642, 16654, ¶ 22 (1997) (“*Price Cap Fourth Report & Order*”) (footnotes omitted); *see also* Fourth Further Notice of Proposed Rulemaking, *Price Cap Performance Review for Local Exchange Carriers*, CC Docket No. 94-1, 13672, ¶ 81 (1995) (“*Fourth Price Cap FNPRM*”) (“The Historical Revenue Method basically reprices access services over a historical period to achieve a target rate of return. To the extent that increases in earnings resulting from increases in productivity would increase the X-Factor, the Historical Revenue Method may not create adequate incentives for increasing productivity.”).

In addition to its incentive problems, the Imputed X Study entails the same administrative problems as rate-of-return regulation. Because this methodology depends on calculating LECs’ interstate costs, the model requires collecting detailed cost data from the LECs. Moreover, the Imputed X study requires that costs for interstate access be isolated from costs for other services

provided by means of the same equipment. As Professor Taylor makes clear in his comments, there is no meaningful way to separate out these common costs. Any such separation requires artificial rules and complex formulae for applying those rules. As the Commission itself has noted, “[t]he Historical Revenue Approach . . . would re-create many of the administrative burdens of rate-of-return regulation, including a substantial reliance on accurate demand and cost forecasts.” *Price Cap Fourth Report & Order*, 12 FCC Rcd at 16654, ¶ 22.

The Commission has articulated no reason why it is now considering a model it has already explicitly — and correctly — rejected. The FNPRM does not offer even a possible explanation of how the flaws the Commission has previously identified can now be overcome. Accordingly, the Commission should reject the use of this methodology and should rely instead on an economically sound TFP model.

B. Continual and Retrospective Revision of the X-Factor Undermines the Purposes of Price-cap Regulation

More generally, the FNPRM proposes several fundamental changes for calculating the X-factor. Among other things, the FNPRM proposes the use of two completely new studies based on different inputs and methodologies than the Commission used in its 1997 plan. These proposed changes follow repeated, *retrospective* changes in the Commission’s X-factor — that is, changing the X-factor going forward supposedly to adjust for some perceived error in the X-factor calculation in the past. *See* FNPRM ¶ 45 (“We also seek comment on whether a CPD should be included to reduce rates and correct for prior years when the X-factor may have been set too low.”).

These continual, often retrospective modifications to the X-factor undermine price-cap regulation. As the Commission has stated, “[p]rice cap regulation is intended to encourage growth in productivity by permitting incumbent LECs that increase their productivity to earn

higher profits, while at the same time ensuring that interstate access customers share in the benefits of productivity growth in the form of lower rates.” *Price Cap Fourth Report & Order*, 12 FCC Rcd at 16645-46, ¶ 2. It is fundamental to this system that LECs can rely with confidence on the promise that, when they outperform the prescribed productivity goals, they will be allowed to benefit from the profits their increased efficiency generates. Each time the Commission manufactures a new reason to break that promise and deprive LECs of the rewards they have earned, the scheme is compromised, and LECs’ future incentives are diminished. *See id.* at 16714, ¶ 179 (recognizing the “harm to LEC productivity incentives that could result from the perception that our regulatory policies unnecessarily lack consistency”).

Even where adjustments are not made retrospectively, the Commission diminishes the effectiveness of price-cap regulation whenever it prospectively alters its method of setting the X-factor based even in part on the LECs’ past productivity growth. If LECs come to believe that the system operates as a one-way ratchet — under which each productivity gain in excess of the target leads the agency to raise the target for the future, thereby effectively depriving them prospectively of the fruits of their past productivity gains — their confidence in the fair administration of the regulatory plan will be jeopardized and their incentive to improve productivity will inevitably be reduced. As the Commission has explained: “[E]ach unexpected change in the X-factor diminished the LECs’ incentive to reduce costs to the maximum extent possible (because such changes increased the chances that the LECs might not retain all of the benefits of doing so) and therefore diminished the efficacy of the incentive-based price caps system.” FCC Brief for Respondents, *United States Tel. Ass’n. v. FCC*, No. 97-1469 (and consolidated cases) at 47-48 (June 15, 1998).

It bears emphasizing that the Commission has used a consistent X-factor in regulating other segments of the telecommunications industry. For example, from 1988 through 1995, a seven year period, the Commission *used a constant productivity factor of 3 percent* in regulating AT&T under price caps. *See, e.g., Memorandum Opinion and Order, AT&T Communications Revisions to Tariff F.C.C. Nos. 1 and 13*, 4 FCC Rcd 5783, 5783, ¶ 3 (1989). In contrast, the Commission's X-factor for LECs has been all over the map. Since 1990, the Commission has proposed or adopted *five different methods to calculate the X-factor, with resulting values that differ by a factor of four*.

Moreover, the current proposed changes to the LECs' X-factor are especially detrimental. In contrast to the Commission's earlier X-factor calculations — which, at the time of their announcement, the Commission suggested were subject to change in the future — the Commission's most recent, 1997 price-cap plan gave no notice that the X-factor might be fundamentally altered yet again. To the contrary, the Commission's 1997 price-cap plan was expressly denominated “*permanent*”: “In this Order, we make significant changes to our interim price cap plan and *adopt the revised plan as our permanent price cap regulatory regime for incumbent LECs.*” *Price Cap Fourth Report & Order*, 12 FCC Rcd at 16647, ¶ 7 (emphasis added). In addition, the Commission promised that “in the next performance review, we would plan to focus on ensuring, to the extent possible, that any adjustments to our rules would not substantially undermine each price cap incumbent LEC's incentives to improve its efficiency.” *Id.* at 16714, ¶ 180. If, in the face of these pronouncements, the Commission now alters the X-factor's basic structure yet again, the Commission's credibility will be seriously damaged, making it significantly less likely that the Commission will be able to establish effective efficiency incentives in the future.

Given the Commission's indication that the 1997 price-cap plan would be "permanent," the retrospective changes contemplated in the FNPRM undermine the LECs' reasonable expectations. The Commission now threatens to reopen books that were previously thought closed and to revisit transactions previously thought settled. If this were permitted, the revenues on which LECs reasonably relied would not be jeopardized, and the investment decisions they made would be left without economic support.

Accordingly, SBC urges the Commission to refrain from making retrospective changes and to maintain prospectively the methodology adopted in 1997 for determining future X-factors. As USTA has persuasively argued, the Commission should use either USTA's TFPRP model or the 1997 TFP model, as appropriately updated.

III. THE COMMISSION SHOULD NOT MANIPULATE THE X-FACTOR METHODOLOGY TO CREATE AN ARTIFICIALLY HIGH X-FACTOR

The D.C. Circuit, in reversing and remanding the Commission's 1997 X-factor decisions, made clear that the Commission may not arbitrarily manipulate data to inflate the X-factor. Specifically, the Court of Appeals found fault in the Commission's devaluation of low data points, in its discovery of an "upward trend" in the data to justify picking a value from the high end of the range of reasonableness, in its giving independent weight to higher estimates made by AT&T to justify extending the range of reasonableness upward, and in its decision to add a 0.5 percent CPD on to its final number. *See United States Tel. Ass'n*, 188 F.3d at 525-28. It is obviously incumbent on the Commission to forswear such result-oriented decisionmaking in the current rulemaking.

Nevertheless, several aspects of the FNPRM suggest that the Commission intends to follow the same erroneous course. As USTA points out in its comments, the proposed 1999 Staff TFP study alters nearly every variable in the 1997 study, most of which have never been

challenged. Each of these changes results in an increase in the X-factor. Indeed, the study's new cost-of-capital determination alone would remove an average of \$3 billion of earnings annually. Similarly, the proposed Imputed X study, which, as mentioned, is fundamentally flawed, is self-consciously designed to increase the X-factor and eliminate earnings beyond cost.

Moreover, the Commission continues to propose a CPD, even though there is no longer any plausible reason to do so. The Commission originally adopted a CPD because, at its inception, price-cap regulation was expected to result in significantly greater productivity gains than were shown in available productivity data, which reflected LEC behavior only under rate-of-return regulation. *See United States Tel. Ass'n*, 188 F.3d at 527. Because the X-factor is now based on data developed under price-cap regulation, there is no reason to retain the CPD. Furthermore, the D.C. Circuit rejected the Commission's attempt to create a new justification for retaining a .5 percent CPD — the claim that the CPD is necessary to offset the elimination of sharing — because the Commission did not adequately articulate why this is necessary. *See id.* The Commission now seeks *new justifications* for retaining the CPD, such as the need “to correct for prior years when the X-factor may have been set too low” (FNPRM ¶ 45), and also seeks aid in bolstering its sharing-elimination argument (*see id.* ¶ 44).

Similarly, despite the D.C. Circuit's admonition against choosing an X-factor based on an “[a]lleged upward trend” (*United States Tel. Ass'n*, 188 F.3d at 526), the Commission openly seeks support for finding such a trend. Specifically, the FNPRM asks whether the Commission “[c]ould or should . . . consider prescribing above the mean?” and seeks “other justifications . . . for selecting above or below some measure of central tendency.” FNPRM ¶ 27.

The Commission should reject each of these proposals, which appear to be little more than invitations to manipulate the objective data to achieve an X-factor of 6 percent or higher —

precisely the kind of outcome-skewing analysis that the D.C. Circuit struck down in the most recent price-cap appeal and that the Court has repeatedly condemned in other contexts. As the Court has made clear, “[s]uch result-oriented manipulation of an objective ratemaking calculation is patently arbitrary and capricious decisionmaking.” *Public Serv. Comm’n of the State of New York v. FERC*, 813 F.2d 448, 465 (D.C. Cir. 1987).

Indeed, an X-factor of 6 percent or higher is plainly unrealistic under any fair, accurate measure. The Commission used a productivity factor of 3 percent for regulating AT&T; for cable service, the Commission *has used a productivity factor of zero*. See, e.g., Memorandum Opinion and Order, *AT&T Communications Revisions to Tariff F.C.C. Nos. 1 and 13*, 4 FCC Rcd at 5783 ¶ 3; Memorandum Opinion and Order, *Implementation of Sections of the Cable Television Consumer Protection and Competition Act of 1992, Rate Regulation*, MM Docket No. 93-215 (rel. Sept. 29, 1994). Especially given that telecommunications technologies are converging, it makes no sense to treat LECs so differently from these other segments of the industry.

In the end, the lower access charges sought by the Commission will not come overnight by forcing access charges down arbitrarily, but only by allowing competitive market forces to drive charges down. After all, price-cap regulation is merely “an appropriate transitional mechanism to competition.” *Price Cap Performance First Report*, 10 FCC Rcd at 8966, ¶ 4. Accordingly, rather than manipulate objective data to arrive at a predetermined result, the Commission’s goal would best be served by facilitating competition.

CONCLUSION

In sum, the Commission should set the X-factor for the Court’s remand period based on the 1997 TFP model; going forward, it should adopt either USTA’s TFPRP model or the 1997

TFP model, appropriately updated. The Commission's other proposals threaten the fundamental goals of price-cap regulation and should be rejected. Moreover, regardless of what study the Commission adopts, it must select an X-factor from the reasonable range in a fair, straightforward manner.

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January 7, 2000

CERTIFICATE OF SERVICE

On this 7th day of January 2000, I, Charles J. Scharnberg, hereby certify that the Comments of SBC have been served upon the parties listed in the attached Service List.

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